

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHELLE McDONALD-WITHERSPOON,	:	
Individually and as Administratrix of the	:	CIVIL ACTION
ESTATE OF KENYADA JONES	:	
Plaintiff	:	NO. 17-CV-1914-TON
vs.	:	
CITY OF PHILADELPHIA; ET AL.	:	
Defendants	:	

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**PLAINTIFF'S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT**  
**FILED BY DEFENDANTS CITY OF PHILADELPHIA**

Plaintiff, through the undersigned attorney, Cristal Law Firm LLC, by way of response to the Motion for Summary Judgment filed by the above defendants, hereby states that plaintiff opposes the motion in its entirety for the reasons set forth in the attached brief in opposition and the exhibits appended thereto. Also attached is a form of Order and certificate of service.

Wherefore, plaintiff requests that the attached order be entered denying the motion in its entirety for the foregoing reasons.

CRISTAL LAW FIRM LLC  
By: /s/ Stephen Cristal  
PA Atty. ID #95020, NJ Atty ID#032841995  
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Attorneys for Plaintiff

Dated: July 30, 2019

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Individually and as Administratrix of the	:	CIVIL ACTION
ESTATE OF KENYADA JONES	:	
Plaintiff	:	NO. 17-CV-1914-TON
vs.	:	
CITY OF PHILADELPHIA; ET AL.	:	<b>ORDER DENYING</b>
Defendants	:	<b>SUMMARY JUDGMENT</b>

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AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2019, upon  
consideration of the Motion for Summary Judgment filed by defendant CITY OF  
PHILADELPHIA, and the response in opposition filed by plaintiff, and the oral argument if any,  
and for good cause shown, it is HEREBY ORDERED that the Motion is DENIED.

BY THE COURT:

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U.S.D.J.